



Council of the  
European Union

Brussels, 22 May 2025  
(OR. en)

8872/25

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Interinstitutional File:  
2025/0123(NLE)

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LIMITE

CORLX 461  
CFSP/PESC 688  
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#### LEGISLATIVE ACTS AND OTHER INSTRUMENTS

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Subject: COUNCIL REGULATION amending Regulation (EU) No 36/2012  
concerning restrictive measures in view of the situation in Syria

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**COUNCIL REGULATION (EU) 2025/...**

**of ...**

**amending Regulation (EU) No 36/2012  
concerning restrictive measures in view of the situation in Syria**

THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Article 215 thereof,

Having regard to Council Decision (CFSP) 2025/... of ... amending Decision 2013/255/CFSP concerning restrictive measures in view of the situation in Syria<sup>1+</sup>,

Having regard to the joint proposal from the High Representative of the Union for Foreign Affairs and Security Policy and the European Commission,

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<sup>1</sup> OJ L, ..., ELI: ...

<sup>+</sup> OJ: please insert the reference number and date of adoption of the Decision set out in ST 8869/25 and complete the corresponding footnote.

Whereas:

- (1) On 18 January 2012, the Council adopted Regulation (EU) No 36/2012<sup>2</sup> concerning restrictive measures in view of the situation in Syria and, on 31 May 2013, the Council adopted Decision 2013/255/CFSP<sup>3</sup> following the adoption of Council conclusions in which the Council condemned the violence and widespread and systematic gross violations of human rights in Syria.
- (2) On 27 May 2024, the Council adopted Decision (CFSP) 2024/1510<sup>4</sup>, extending the restrictive measures set out in Decision 2013/255/CFSP until 1 June 2025.
- (3) Following the fall of al-Assad's regime in Syria, on 24 February 2025, the Council eased a number of Union restrictive measures in view of the situation in Syria in order to facilitate engagement with the country, its people and businesses in the areas of energy, transport and reconstruction, as well as to facilitate the associated financial and banking transactions. On the same date, the Council issued a declaration stating that listings related to the al-Assad regime, the chemical weapons sector and illicit drug trade should be maintained.
- (4) On 20 May 2025, the Council announced its political decision to lift its economic sanctions on Syria, to support the Syrian people in reuniting and rebuilding a new, inclusive, pluralistic and peaceful Syria free from harmful foreign interference.

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<sup>2</sup> Council Regulation (EU) No 36/2012 of 18 January 2012 concerning restrictive measures in view of the situation in Syria and repealing Regulation (EU) No 442/2011 (OJ L 16, 19.1.2012, p. 1, ELI: <http://data.europa.eu/eli/reg/2012/36/oj>).

<sup>3</sup> Council Decision 2013/255/CFSP of 31 May 2013 concerning restrictive measures in view of the situation in Syria (OJ L 147, 1.6.2013, p. 14, ELI: <http://data.europa.eu/eli/dec/2013/255/oj>).

<sup>4</sup> Council Decision (CFSP) 2024/1510 of 27 May 2024 amending Decision 2013/255/CFSP concerning restrictive measures in view of the situation in Syria (OJ L, 2024/1510, 28.5.2024, ELI: <http://data.europa.eu/eli/dec/2024/1510/oj>).

- (5) On this basis, the Council considers that all sectoral restrictive measures should be lifted, with the exception of those based on security grounds.
- (6) On the basis of a review of Decision 2013/255/CFSP and determinations made in that context, on ... the Council adopted Decision (CFSP) 2025/...<sup>+</sup>, extending some of the restrictive measures set out in Decision 2013/255/CFSP until 1 June 2026.
- (7) The power to establish and amend the list in Annex II to Regulation (EU) No 36/2012 should be exercised by the Council in order to ensure consistency with the process for establishing, amending and reviewing Annex I to Decision 2013/255/CFSP.
- (8) These measures fall within the scope of the Treaty on the Functioning of the European Union and therefore, in particular with a view to ensuring their uniform application in all Member States, regulatory action at the level of the Union is necessary.
- (9) Regulation (EU) No 36/2012 should therefore be amended accordingly,

HAS ADOPTED THIS REGULATION:

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<sup>+</sup> OJ: please insert the date of adoption and reference number of the Decision set out in ST 8869/25.

## *Article 1*

Regulation (EU) No 36/2012 is amended as follows:

(1) Article 14 is replaced by the following:

### *‘Article 14*

1. All funds and economic resources belonging to, owned, held or controlled by the natural or legal persons, entities and bodies listed in Annex II shall be frozen.
2. No funds or economic resources shall be made available, directly or indirectly, to or for the benefit of the natural or legal persons, entities or bodies listed in Annex II.
3. The participation, knowingly and intentionally, in activities the object or effect of which is, directly or indirectly, to circumvent the measures referred to in paragraphs 1 and 2 shall be prohibited.’;

(2) Article 15 is replaced by the following:

*‘Article 15*

1. Annex II shall consist of the following:

(a) Annex II shall consist of a list of natural or legal persons, entities and bodies who, in accordance with Article 19(1) of Decision 2011/782/CFSP, have been identified by the Council as being persons or entities responsible for the violent repression against the civilian population in Syria, persons and entities who have benefited from or supported the al-Assad regime, and natural or legal persons and entities associated with them, and to whom Article 21 of this Regulation shall not apply.

1a. The list in Annex II shall also consist of natural or legal persons, entities and bodies who, in accordance with Article 28(2) of Council Decision 2013/255/CFSP\* have been identified by the Council as falling within one of the following categories:

- (a) leading businesspersons operating in Syria linked to the former al-Assad regime;
- (b) members of the al-Assad or Makhoul families;
- (c) Syrian Government Ministers in power between May 2011 and December 2024;

- (d) members of the Syrian Armed Forces of the rank of “colonel” and the equivalent or higher in post between May 2011 and December 2024;
- (e) members of the Syrian security and intelligence services in post between May 2011 and December 2024;
- (f) members of the al-Assad regime-affiliated militias; or
- (g) members of entities, units, agencies, bodies or institutions operating in the chemical weapons proliferation sector,

and natural or legal persons and entities associated with them.

- 1b. Persons, entities and bodies within one of the categories referred to in paragraph 1a shall not be included or retained on the list of persons, entities and bodies in Annex II if there is sufficient information that they are not, or are no longer, associated with the former al-Assad regime or do not exercise influence over it or do not pose a real risk of circumvention.
- 2. Annex II shall include the grounds for the listing of listed persons, entities and bodies concerned.

3. Annex II shall also include, where available, information necessary to identify the natural or legal persons, entities and bodies concerned. With regard to natural persons, such information may include names including aliases, date and place of birth, nationality, passport and ID card numbers, gender, address, if known, and function or profession. With regard to legal persons, entities and bodies, such information may include names, place and date of registration, registration number and place of business.

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\* Council Decision 2013/255/CFSP of 31 May 2013 concerning restrictive measures against Syria (OJ L 147, 1.6.2013, p. 14, ELI: <http://data.europa.eu/eli/dec/2013/255/oj>).’;

- (3) Article 15a is inserted:

*‘Article 15a*

1. By way of derogation from Article 14(1), (2) and (3), the competent authorities of a Member State, as identified on the websites listed in Annex III, may authorise the release of certain frozen funds or economic resources, or the making available of certain funds or economic resources, to the entities listed as Number 42 and Number 43 in Annex II, under such conditions as they deem appropriate, after having determined that the provision of such funds or economic resources is necessary for the cooperation between those entities and a Member State’s governmental entity or body in the areas of reconstruction, capacity-building, counter-terrorism and migration.



2. In the absence of a negative decision, a request for information or a notification for additional time from the relevant competent authority within five working days of the date of receipt of a request for authorisation under paragraph 1, that authorisation shall be considered granted.
3. The Member State concerned shall inform the other Member States and the Commission of any authorisations granted under paragraphs 1 and 2 within four weeks of such authorisation.
4. The participation, knowingly and intentionally, in activities the object or effect of which is, directly or indirectly, to circumvent the measures referred to in paragraphs 1, 2 and 3 shall be prohibited.’;

(4) Article 16 is amended as follows:

(a) point (a) is replaced by the following:

‘(a) necessary to satisfy the basic needs of natural or legal persons, entities or bodies listed in Annex II, and dependent family members of such natural persons, including payments for foodstuffs, rent or mortgage, medicines and medical treatment, taxes, insurance premiums, and public utility charges;’;

(b) point (i) is replaced by the following:

‘(i) intended exclusively for payments by Syrian State-owned entities, as listed in Annex II, on behalf of the Syrian Arab Republic to the OPCW for activities related to the OPCW verification mission and the destruction of Syrian chemical weapons, including in particular payments to the OPCW Special Trust Fund for activities related to the complete destruction of Syrian chemical weapons outside the territory of the Syrian Arab Republic.’;

(5) Article 18(1) is amended as follows:

(a) paragraph (a) is replaced by the following:

‘(a) the funds or economic resources are the subject of an arbitral decision rendered prior to the date on which the natural or legal person, entity or body referred to in Article 14 was listed in Annex II, or of a judicial or administrative decision rendered in the Union, or a judicial decision enforceable in the Member State concerned, prior to or after that date;’;

(b) paragraph (c) is replaced by the following:

‘(c) the decision is not for the benefit of a natural or legal person, entity or body listed in Annex II;’;

- (6) Article 20 is replaced by the following:

*‘Article 20*

By way of derogation from Article 14 and provided that a payment by a person, entity or body listed in Annex II is due under a contract or agreement that was concluded by, or an obligation that arose for the person, entity or body concerned before, the date on which that person, entity or body had been designated, the competent authorities of the Member States, as indicated on the websites listed in Annex III, may authorise, under such conditions as they deem appropriate, the release of certain frozen funds or economic resources, provided that the payment is not directly or indirectly received by a person or entity referred to in Article 14.’;

- (7) Article 20a is replaced by the following:

*‘Article 20a*

By way of derogation from Article 14, the competent authorities of the Member States, as identified on the websites listed in Annex III, may authorise, under such conditions as they deem appropriate, the transfer by or through a financial entity listed in Annex II of funds or economic resources, where the transfer is related to a payment by a person or entity not listed in Annex II in connection with the provision of financial support to Syrian nationals pursuing an education, professional training or engaged in academic research in the Union, provided that the competent authority of the relevant Member State has determined, on a case-by-case basis, that the payment will not directly or indirectly be received by a person or entity listed in Annex II.’;

(8) in Article 21c(1) the final subparagraph is replaced by the following:

‘provided that the competent authority of the relevant Member State has determined, on a case-by-case basis, that the payment will not directly or indirectly be received by any person or entity listed in Annex II and provided that the transfer is not otherwise prohibited by this Regulation.’;

(9) in Article 27(1), point (a) is replaced by the following:

‘(a) designated persons, entities or bodies listed in Annex II;’;

(10) Article 27a is replaced by the following:

*‘Article 27a*

It shall be prohibited to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the provisions of Articles 2a, 3 and 3a.’;

(11) Article 32 is amended as follows:

(a) paragraph 1 is replaced by the following:

‘1. Where the Council decides to subject a natural or legal person, entity or body to the measures referred to in Article 14, it shall amend Annex II to accordingly.’;

(b) paragraph 4 is replaced by the following:

‘4. The list in Annex II shall be reviewed at regular intervals and at least every 12 months.’;

- (12) Articles 1a, 6, 6a, 6b, 7, 7a, 8, 9, 9a, 10, 11, 11a, 11b, 12, 13, 13a, 21, 21a, 21b, 23, 24, 25, 25a, 26 and 26a are deleted;
- (13) Annexes IV, Va, Vb, VI, VII, VIII, X and XI are deleted.

*Article 2*

This Regulation shall enter into force on the day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at ..., ...

*For the Council*  
*The President*

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